

### **REMARKS**

This responds to the Office Action mailed on July 23, 2008.

No claims are amended, no claims are canceled, and no claims are added; as a result, claims 1-50 remain pending in this application.

#### **Information Disclosure Statement**

Pursuant to the telephonic conversation between Dawn Shaw and Examiner Thomas Dailey on 10/22/2008, it was agreed that the NPL documents listed on the 1449 filed on 5/21/2008 were in fact available to the Examiner in private PAIR. Examiner informed applicants that internal measures would be taken to get the issue resolved and that the applicants need not refile any of the documents. The Examiner said that in any subsequent response, he would include a fully annotated version of the 1449 form filed on 5/21/2008.

#### **§102 Rejection of the Claims**

Claims 1-6, 8-11, 16, 19-23, 27-34, 40-42, 44-48, and 50 were rejected under 35 U.S.C. § 102(b) for anticipation by Bodamer et al. (U.S. 6,236,997).

The Office action cites the foreign database system (FDS) illustrated in Figure 3A in Bodamer to show "a master data server" recited in claim 1. The Office action cites the local server also illustrated in Figure 3A in Bodamer to show "an integrated server" recited in claim 1. In order to show "an integration server, in response to a request from a client to access master data identified by a client identifier, to map the client identifier to a master identifier, retrieve a master data object from the master database based on the master identifier, and map the master data object to a mapped data object based on a set of mapping rules associated with the client" recited in claim 1, the Office action refers to sections in Bodamer reproduced below.

Each of these modules 210 in the heterogeneous services module 311 is configured to map a particular database operation to a target foreign process based upon the operation

specified in the client statement and based upon metadata definitions metadata for the heterogeneous services stored within a data dictionary 220, described below. As shown in FIG. 2B, the data dictionary 220 includes metadata definitions for use by the foundation services 204, as well as for the different modules 210 and 207.

(Bodamer, 7: 9-15.)

For example, assume the data dictionary for the local server process 202 includes a table entitled "user\_catalog," and the client 200 issues a query on "user\_catalog @ FDS", where "FDS" is an identifier for foreign database system 208. However, if the foreign database system 208 does not have the table "user\_catalog", but rather the metadata is spread across different tables, the client 200 is given the appearance that the table exists at the foreign database system 208 in the structure perceived by the client.

Hence, the data dictionary translation gives the appearance to the client that the foreign database system 208 includes metadata in the format and structure as stored for the local server 202. Thus, the heterogeneous services modules 311 and 311' map the query to accommodate the data dictionary structures in the foreign database system 208, get the result back from the foreign database system 208, and return the results to the client 200 in the format of the local server 202.

(Bodamer, 8: 28-46.)

As is evident from the passages reproduced above, Bodamer refers to mapping a particular database operation to a target foreign process. (Bodamer, Fig. 3A; 7: 9-18.) It is submitted that mapping of an operation to a process is distinct from mapping of one identifier to another identifier. In the "Response to Arguments" section, Examiner refers specifically to client query that is issued on "user\_catalog@FDS" (attempting to access, at the foreign database system (FDS), a table that corresponds to the table at a local server entitled "user\_catalog") and states that the query "user\_catalog@FDS" is considered to be "a client identifier." It is submitted

that a query is distinct from an identifier and therefore the query "user\_catalog@FDS" may not be considered to correspond to "a client identifier."

The Office action does not explain which feature of Bodamer is considered to correspond to the "master identifier" recited in claim 1. Bodamer mentions mapping the query (which is distinct from an identifier) to accommodate the data dictionary structures in the foreign database system, but is silent with respect to what exactly the query is mapped to. Furthermore, in the example reproduces above (Bodamer, 8: 28-46), it is explained that while the local server has includes a table entitled "user\_catalog" the foreign database system does not have a table "user\_catalog," but rather the metadata is spread across different tables. There is no explanation in Bodamer how the query directed at a "user\_catalog" table is processed in order to accommodate such request from the client.

It is respectfully requested that it is explained which feature Bodamer is considered to correspond to the "master identifier" of claim 1. It is also requested that it is explained which particular operations in Bodamer is considered to correspond to the operations "to map the client identifier to a master identifier," to "retrieve a master data object from the master database based on the master identifier," and to "map the master data object to a mapped data object," as recited in claim 1. It is respectfully submitted that giving the appearance to the client, in response to issues a query on "user\_catalog @ FDS", that the table exists at the foreign database system 208 in the structure perceived by the client, is distinct from operations "to map the client identifier to a master identifier," to "retrieve a master data object from the master database based on the master identifier," and to "map the master data object to a mapped data object" as recited in claim 1.

Bodamer thus does not disclose or suggest "an integration server, in response to a request from a client to access master data identified by a client identifier, to map the client identifier to a master identifier, retrieve a master data object from the master database based on the master identifier, and map the master data object to a mapped data object based on a set of mapping rules associated with the client." Because Bodamer fails to disclose or suggest every element of

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claim 1, claim 1 and its dependent claims are patentable in view of Bodamer and should be allowed.

Claim 19 recites "an integration server, in response to a request from any one of the clients to access a master data object, to retrieve the master data object from the master database and map the master data object to a mapped data object based on a set of mapping rules associated with the client so that the mapped data object contains the subset of attributes in a format that can be processed by the client." Thus, claim 19 is patentable in view of Bodamer and should be allowed for at least the reasons articulated with respect to claim 1.

Claim 20 recites "mapping the master data object to a mapped data object based on a set of mapping rules associated with the client." Thus, claim 20 and its dependent claims are patentable in view of Bodamer and should be allowed for at least the reasons articulated with respect to claim 1.

Claim 28 recites "providing an interface for mapping subsets of the master data into mapped data having a format that is acceptable to each client." The Office action cites the following passage in Bodamer to show this feature.

A fourth type of translation is data dictionary translation, executed in a SQL services module 210b within the heterogeneous services module 311 of the local server 202. Every relational database has its own set of data dictionary tables which store various kinds of information (known as "metadata") about the objects in the database created by its various users. This set of tables along with views defined on them are together called the "data dictionary." As a user makes modifications to his schema (for example, creating or deleting a table), the local server 202 will keep track of the modification by automatically adding or deleting entries in one or more tables of the data dictionary. (Bodamer, 8: 9-21.)

As is evident from the passage above, Bodamer is silent with respect to mapping one set of data to another set of data. Thus, Bodamer fails to disclose or suggest "providing an interface

for mapping subsets of the master data into mapped data having a format that is acceptable to each client," as recited in claim 28. Thus, claim 28 and its dependent claims are patentable in view of Bodamer and should be allowed.

Claim 40 recites a processor to "map the master data object to a mapped data object based on a set of mapping rules associated with the client." Thus, claim 40 is patentable in view of Bodamer and should be allowed for at least the reasons articulated with respect to claim 1.

Claim 41 recites a processor to "provide an interface for mapping subsets of the master data into mapped data having a format that is acceptable to each client." Thus, claim 41 is patentable in view of Bodamer and should be allowed for at least the reasons articulated with respect to claim 1.

Claim 42 recites a processor to "map the first identifier to a second identifier used by the second client to identify the data object; map the first identifier to a third identifier used by the data server to identify the data object; query the second client based on the second identifier to determine whether the second client is using the data object." Thus, claim 42 is patentable in view of Bodamer and should be allowed for at least the reasons articulated with respect to claim 1.

Claim 44, as amended, recites a processor to "access the master data associated with the object on the database by requesting that an integration server that communicates with the programmable processor and the master data server map the master data in the master data server to a mapped data set that has a format conforming to rules defined by the programmable processor and send the mapped data set to the programmable processor." Thus, claim 44 and its dependent claims are patentable in view of Bodamer and should be allowed for at least the reasons articulated with respect to claim 1.

Claims 39 and 43 were rejected under 35 U.S.C. § 102(b) for anticipation by Mahajan et al. (U.S. Patent No. 6,226,650).

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Mahajan discusses a system and method for updating client computer systems that enable client computer systems to be added to the ICDB system without requiring the ICDB system to create client-specific modification files for each client. In this system, continues Mahajan, *data on the server may be arranged in groups based on content and semantics*. One or more of the groups [of data] are assigned to each client depending on the data requirements of the client. Periodically, the server determines the data that has changed for each group [of data] since the last evaluation, and records those changes in a modification file. When a client connects to the server, it requests the modification files for the groups [of data] to which it subscribes, merges the downloaded modification files, filters the superfluous data, and updates its local database. (Mahajan, 4: 15-29.)

It is submitted that assigning a group of data to a client, based on the data requirements of the client, is distinct from placing two clients into the same group. Thus, while Mahajan mentions arranging the data on the server into groups, Mahajan does not contemplate grouping clients based on respective sets of characteristics sent by the clients. In contrast, claim 39 discloses "placing the first client and clients who sent a set of characteristics that are the same as the first set of characteristics into a client group; and generating a data distribution path to allow updates of the set of characteristics to be sent to the client group."

Because Mahajan fails to disclose or suggest creating a group of clients or "placing the first client and clients who sent a set of characteristics that are the same as the first set of characteristics into a client group; and generating a data distribution path to allow updates of the set of characteristics to be sent to the client group," claim 39 is patentable and should be allowed.

Claim 43 recites a processor to "place the first client and clients who sent a set of characteristics that are the same as the first set of characteristics into a client group; and generate a data distribution path so that the programmable processor can route updates of the set of characteristics to the client group" Thus, claim 43 is patentable in view of Mahajan and should be allowed for at least the reasons articulated with respect to claim 39.

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§103 Rejection of the Claims

Claims 7, 12-15, 17-18, 24-26, 35-38, and 49 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Badamer in view of what was well known in the art at the time of the invention.

Claims 7, 12-15, 17-18, 24-26, 35-38 and 49 are patentable and should be allowed for at least the reasons articulated above with respect to their respective independent claims.

CONCLUSION

Applicants respectfully submit that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicants' attorney 408-278-4052 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

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**CERTIFICATE UNDER 37 CFR 1.8:** The undersigned hereby certifies that this correspondence is being filed using the USPTO's electronic filing system EFS-Web, and is addressed to: Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on this 31<sup>st</sup> day of October 2008.

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